

REDACTED – FOR PUBLIC INSPECTION

convo

February 15, 2017

Received & Inspected

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

FEB 22 2017

FCC Mail Room

**RE: Telecommunications Relay Services and Speech-to-Speech Services for
Individuals with Hearing and Speech Disabilities, CG Docket Nos. 03-123 and 10-51.**

Dear Ms. Dortch:

Pursuant to paragraph 5 of the Commission's Second Protective Order in the above-referenced proceedings, Convo Communications, LLC ("Convo") submits two copies of the attached REDACTED – FOR PUBLIC INSPECTION version of the February 15, 2017 *Ex Parte* containing information about Convo's 2016 operating costs that it has filed in the above-referenced dockets.

The copy of the February 15, 2017 *Ex Parte* stamped Highly Confidential Document has been sent under separate cover.

Sincerely,

/s/

Jeff Rosen
General Counsel

Attachments

DOCKET FILE COPY ORIGINAL

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VIA ECFS

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Ms. Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

**Re: Telecommunications Relay Services and Speech-to-Speech Services for Individuals
with Hearing and Speech Disabilities, CG Docket No. 03-123; CG Docket No. 10-51**

Dear Ms. Dortch:

Convo Communications, LLC ("Convo") is filing this *ex parte* to provide the Federal Communications Commission ("Commission") in the attached document its detailed 2016 operating costs in support of the joint non-dominant VRS providers' rate proposal.¹ Convo is providing its information using the same criteria and cost categories as those used by the TRS Fund Administrator in collecting and compiling provider data in developing the annual Interstate TRS compensation rates.

Convo previously filed with the Commission its detailed 2015 operating costs,² which were also supplied to the TRS Fund Administrator.

Respectfully submitted,

/s/

Jeff Rosen
General Counsel
Convo Communications, LLC
2028 E Ben White Blvd #240-2168
Austin, TX 78741
(240) 560-4396
jeff@convorelay.com

cc: Karen Peltz Strauss
Deputy Bureau Chief
Consumer & Government Affairs Bureau

¹ See ASL Services Holdings, LLC dba GlobalVRS, Convo Communications, LLC, CSDVRS, LLC dba ZVRS, Purple Communications, Inc., Video Relay Service (VRS) Rate Proposal, CG Docket Nos. 10-51 & 03-123 (Jan. 31, 2017).

² Convo *ex parte*, CG Docket Nos. 10-51 & 03-123 (Jan. 29, 2016).

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Robert Aldrich
Legal Advisor
Consumer & Government Affairs Bureau

Eliot Greenwald
Deputy Chief
Disability Rights Office

Michael Scott
Attorney
Disability Rights Office

Attachment [Redacted]



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Attachment [Redacted]

**REDACTED - FOR
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Convo Communications LLC
Statement of VRS Costs
Period covered 1/1/2016 to 12/31/2016

Actuals
2016

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VRS Minutes

Annual Semi-Fixed

Rent	\$
Utilities	
	<u>\$</u>

B Direct Variable

Salary & Benefits VI's	\$
Salary & Benefits CC Mgrs	
Salary & Benefits CC Staff	
Telecom	
Relay Center Expenses	
B Annual recurring	<u>\$</u>

C Admin Expenses

Finance	\$
Legal Regulatory	
Engineering	
R&D	
Operations Support	
Human Resources	
Risk Mgmt	
Other Corp ovhds	
	<u>\$</u>

D Depreciation

Furniture	\$
Telecommunications Equip	
Leasehold	
Other capitalized	
	<u>\$</u>

E Other TRS expense

Marketing/ advertising	\$
Outreach	
CPE	
	<u>\$</u>

G. E911 Costs \$

Total VRS Expenses \$

VRS Cost/ minute \$

Allowable VRS expense \$

Allowable VRS Cost/ minute \$

Cost data only, no allowance for return

excludes Outreach, CPE and R&D

Cost data only, no allowance for return

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**Convo Communications LLC
Statement of VRS Costs
Period covered 1/1/2016 to 12/31/2016**

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2016

VRS Minutes

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CPE	
	\$

G. E911 Costs	\$
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Total VRS Expenses	\$
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VRS Cost/ minute	\$	Cost data only, no allowance for return
Allowable VRS expense	\$	excludes Outreach, CPE and R&D
Allowable VRS Cost/ minute	\$	Cost data only, no allowance for return